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             DISTRICT OF NEVADA
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19   **UNITED STATES DISTRICT COURT**

20   **DISTRICT OF NEVADA**

21
   UNWIRED PLANET LLC, a Nevada   Case No. 3:12-cv-00504-MMD-VPC
22 limited liability company,
                                            UNOPPOSED MOTION TO EXTEND
23   Plaintiff,   **DEADLINE TO COMPLY WITH**
                                            ORDER GRANTING DEFENDANT
24   v.   **GOOGLE'S MOTION TO COMPEL**
                                            SUPPLEMENTARY INFRINGEMENT
25 GOOGLE INC., a California corporation,   **CONTENTIONS [DKT. NO. 438]**

26   Defendant.   **(First Request as to '087 Patent)**

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Plaintiff Unwired Planet LLC ("UP"), by and through its counsel of record, hereby respectfully submits this unopposed motion for an extension to comply with the Court's order (dkt. 438) to supplement its contentions as to the '087 patent to November 28, 2014.

MEMORANDUM OF POINTS AND AUTHORITIES

On October 21, 2014 the Court granted Google's motion to compel supplementary infringement contentions. Dkt. No. 438. The Order requires UP to supplement its contentions for the '087 patent to specifically identify three items and provide pin citations to source code for one of the items. *Id.* at 1-2. The deadline for complying with this order is November 21, 2014. *Id.* at 1. The Court's order also denied, without prejudice with leave to refile, UP's motion for historic source code (dkt. 269), and stated that UP could refile its motion "upon UP's articulation of proper infringement contentions for the historic code, and subsequent noncompliance by Google with proper discovery requests pertaining to such code." *Id.* at 3.

UP has worked diligently to comply with the Court's order. UP has worked with its experts to supplement its contentions, and required additional review of Google's source code in order to do so. UP is currently reviewing Google's source code, and plans to continue doing so through November 26, 2014. UP plans to include citations from this review of Google's source code in its supplemental infringement contentions. However, given that the source code review is ongoing, UP expects that including such citations will take longer than the current deadline of November 21, 2014.

As a result, UP requests an extension to comply with the Court's order to supplement its contentions as to the '087 patent to November 28, 2014.   UP has discussed this requested extension with Google, and Google has noted that it does not oppose UP's requested extension

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1   until November 28, 2014. UP has not requested, nor has the Court granted, any previous

2   extension to comply with the Court's October 21st order with respect to the '087 patent.

3   Therefore, based on the above, UP respectfully requests that its unopposed motion for an

4   extension to comply with the Court's order to supplement its contentions as to the '087 patent to

5   November 28, 2014 be granted.

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8   Dated: November 20, 2014   Respectfully submitted,

9   WATSON ROUNDS

10   */s/ Michael D. Rounds*

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ATTORNEYS FOR PLAINTIFF
UP LLC

IT IS SO ORDERED:

_____
UNITED STATES MAGISTRATE JUDGE

DATED: __November 20, 2014__

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CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I am an employee of Watson Rounds and that on

this date a true and correct copy of the foregoing document will be served upon counsel of

record, via electronic mail, through the United States District Court's CM/ECF system.

Dated: November 20, 2014

/s/ Jeff Tillison
An Employee of Watson Rounds

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